

## **Exhibit A**

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*Attorneys for Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

	)	
RAZOR USA LLC and SHANE CHEN,	)	C.A. No. 2:19-cv-12939-JMV-MF
	)	
Plaintiffs,	)	
	)	<b>DISCLOSURE OF ASSERTED CLAIMS</b>
v.	)	<b>AND INFRINGEMENT CONTENTIONS &amp;</b>
	)	<b>DOCUMENT PRODUCTION</b>
DGL GROUP, LTD.,	)	<b>[L. PAT. R. 3.1 &amp; 3.2]</b>
	)	
Defendant.	)	
	)	
	)	

Pursuant to Local Patent Rule 3.1, Plaintiffs Razor USA LLC (“Razor”) and Shane Chen (“Chen”) (jointly, “Plaintiffs”) submit the following Disclosure of Asserted Claims and Infringement Contentions for U.S. Reissue Patent No. RE46,964 (the “RE964 Patent”) and U.S. Design Patent No. D739,906 (the “D906 Patent”) (jointly, the “Asserted Patents”). Plaintiffs also identify documents produced pursuant to Local Patent Rule 3.2. Plaintiffs’ disclosure is based on information currently available to and located by Plaintiffs. Plaintiffs have not completed their investigation of the facts relating to this case, have not completed discovery in this action, and have not completed preparation for trial. Moreover, despite Plaintiffs’ request (*see* D.I. 22) and the Court’s order for the parties to exchange documents (*see* D.I. 18), Defendant DGL Group, Ltd. (“Defendant”) has not produced any documents to date, including technical documents regarding Defendant’s accused products. Accordingly, the disclosures below are as specific as currently possible based on the publicly available information currently available to Plaintiffs. Plaintiffs expressly reserve the right to amend, supplement, or otherwise modify their disclosure as additional information becomes available through discovery or as necessitated by the Court’s claim construction order.

**I. DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS**

**PURSUANT TO L. PAT. R. 3.1**

**A. L. Pat. R. 3.1(a) – Asserted Claims**

Plaintiffs assert that Defendant infringes claims 1, 3, 5-11, and 13-17 of the RE964 Patent as well as the design claimed in the D906 Patent (collectively, the “Asserted Claims”) under at least 35 U.S.C. § 271(a)-(c). Plaintiffs reserve the right to amend, supplement, or otherwise modify their identification of the Asserted Claims as additional information becomes available through discovery.

**B. L. Pat. R. 3.1(b) – Accused Products**

Plaintiffs assert that Defendant’s two-wheel self-balancing vehicles including, for example, products referred to by the name “Hover-1” (the “Accused Products”) infringe the Asserted Claims. The Accused Products include products marked under various names, including the Hover-1 Ultra, Hover-1 All-Star, Hover-1 Chrome, Hover-1 Eclipse, Hover-1 Freedom, Hover-1 H1, Hover-1 Helix, Hover-1 Horizon, Hover-1 Liberty, Hover-1 Matrix, Hover-1 Superstar, Hover-1 Nomad, Hover-1 Titan, Hover-1 Beast, and Hover-1 X10.

Defendant has not provided Plaintiffs with a complete list of the products that Defendant makes, uses, sells, offers for sale, and/or imports into the United States. Plaintiffs reserve the right to amend, supplement, or otherwise modify their identification of accused products as additional information becomes available through discovery.

**C. L. Pat. R. 3.1(c) – Claim Chart**

Attached as Exhibit 1 is a claim chart identifying where each limitation of each of the Asserted Claims of the RE964 Patent can be found in Defendant’s Hover-1 Ultra product. As with Plaintiffs’ disclosures generally, this claim chart is based on publicly available information currently available to Plaintiffs, in light of Defendant’s refusal to produce documents, particularly technical documents regarding Defendant’s accused products. Plaintiffs are informed and believe, that all the Accused Products infringe the Asserted Claims of the RE964 Patent in the same manner as the Hover-1 Ultra product and, on that basis, Plaintiffs disclose their contention that all the Accused Products infringe in the manner set forth in Exhibit 1.

Plaintiffs reserve the right to amend, supplement, or otherwise modify the attached chart and their infringement contentions as additional information becomes available through discovery or as necessitated by the Court’s claim construction order. In particular, Plaintiffs reserve the right

to supplement this disclosure with additional claim charts for other Accused Products if Plaintiffs or Defendant identify that the infringement issues differ for any Accused Products.

**D. L. Pat. R. 3.1(d) – Indirect Infringement**

Defendant is inducing and has induced direct infringement of the Asserted Patents by others, including by actively instructing, assisting, and/or encouraging others to make, use, sell, offer for sale, and/or import into the United States the Accused Products, in violation of 35 U.S.C. § 271(b). For example, on information and belief, Defendant induces others to import into the United States the Accused Products that infringe the Asserted Patents and induces others to offer for sale and sell in the United States the Accused Products that infringe the Asserted Patents.

Through at least the same conduct, Defendant is also contributing to and has contributed to direct infringement of the Asserted Patents by others, in violation of 35 U.S.C. § 271(c). For example, Defendant provided and made the Accused Products available for use in the United States, knowing the Accused Products to be especially made or especially adapted for use in a manner that infringes the Asserted Patents.

**E. L. Pat. R. 3.1(e) – Doctrine of Equivalents**

Plaintiffs contend that each limitation of each of the Asserted Claims of the RE964 Patent is present at least under the doctrine of equivalents in each of the Accused Products.

**F. L. Pat. R. 3.1(f) – Priority Dates**

The Asserted Claims of the RE964 Patent are entitled to a priority date of at least as early as February 12, 2012. The design claimed in the D906 Patent is entitled to a priority date of at least as early as March 12, 2013.

**G. L. Pat. R. 3.1(g) – Plaintiffs’ Products Practicing Claimed Invention**

Razor’s Hovertrax<sup>TM</sup> products practice the claims of the RE964 Patent.

**H. L. Pat. R. 3.1(h) – Willful Infringement**

Plaintiffs contend that Defendant's infringement is and has been willful. For example, Plaintiffs provided actual notice to Defendant of its infringement of the Asserted Patents at least as early as September 4, 2018, and Defendant has continued to infringe. In addition, Razor has provided the public with constructive notice of its patent rights pursuant to 35 U.S.C. § 287. On information and belief, Defendant has also monitored the Asserted Patents and the applications from which the Asserted Patents issued and had actual notice of the Asserted Patents through its monitoring. The Accused Products are nearly identical copies of the structures claimed in the RE964 Patent and the design claimed in the D906 Patent. Defendant infringed the Asserted Patents with reckless disregard of Plaintiffs' patent rights. Defendant knew, or should have known, that its actions constituted infringement of the Asserted Patents. Moreover, Defendant's acts of infringement of the Asserted Patents were not consistent with the standards of commerce for its industry.

**II. DOCUMENT PRODUCTION PURSUANT TO L. PAT. R. 3.2**

Plaintiffs have conducted a reasonable search of documents in their possession, custody or control, for documents responsive to L. Pat. R. 3.2. Plaintiffs are producing herewith documents bearing the production numbers RZRDGL0000001-RZRDGL0033674.

Based on information presently available to Plaintiffs, Plaintiffs have not, at this time, identified documents responsive to L. Pat. R. 3.2(a).

Plaintiffs have produced documents responsive to L. Pat. R. 3.2(b) at RZRDGL0000001-RZRDGL0033674. Plaintiffs' identification of documents produced responsive to L. Pat. R. 3.2(b) is ongoing. Plaintiffs will supplement their identification of responsive documents as discovery continues.

Plaintiffs have produced documents responsive to L. Pat. R. 3.2(c) at RZRDGL0000001-RZRDGL0033674. A copy of the file history of the RE964 Patent has been produced at RZRDGL0013975-0014757. A copy of the file history of the D906 Patent has been produced at RZRDGL0014880-0014972. Plaintiffs' identification of documents produced responsive to L. Pat. R. 3.2(c) is ongoing. Plaintiffs may supplement their identification of responsive documents as discovery continues.

Plaintiffs have produced documents responsive to L. Pat. R. 3.2(d) at RZRDGL0000001-RZRDGL0033674. At least the following documents are responsive to L. Pat. R. 3.2(d): RZRDGL0015051-0015074, RZRDGL0015041-0015050, and RZRDGL0015148-0015150. Plaintiffs' identification of documents produced responsive to L. Pat. R. 3.2(d) is ongoing. Plaintiffs may supplement their identification of responsive documents as discovery continues.

Plaintiffs have produced documents responsive to L. Pat. R. 3.2(e) at RZRDGL0000001-RZRDGL0033674. At least the following documents are responsive to L. Pat. R. 3.2(e): RZRDGL0015099-0015147. Plaintiffs' identification of documents produced responsive to L. Pat. R. 3.2(e) is ongoing. Plaintiffs will supplement their identification of responsive documents as discovery continues.

Plaintiffs have produced documents responsive to L. Pat. R. 3.2(f) at RZRDGL0000001-RZRDGL0033674. At least the following documents are responsive to L. Pat. R. 3.2(f): RZRDGL0013567-0013974. Plaintiffs' identification of documents produced responsive to L. Pat. R. 3.2(f) is ongoing. Plaintiffs will supplement their identification of responsive documents as discovery continues. Plaintiffs are also awaiting Defendant's production of documents, including technical documents regarding the Accused Products.

Plaintiffs' search for documents and identification of documents produced corresponding to the categories defined by L. Pat. R. 3.2(a)-(f) is ongoing. Plaintiffs will supplement their production and identification of documents as their investigation of facts relating to this case continues and as discovery continues.

Dated: October 2, 2019

By: /s/ Benjamin A. Katzenellenbogen

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*Attorneys for Plaintiffs*



**CERTIFICATE OF SERVICE**

I am a citizen of the United States of America and I am employed in San Francisco, California. I am over the age of 18 and not a party to the within action. My business address is 333 Bush Street, Suite 2100, San Francisco, California.

On October 2, 2019, I served the foregoing **DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS & DOCUMENT PRODUCTION [L. PAT. R. 3.1 & 3.2]** on the parties or their counsel in the manner indicated below:

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I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on October 2, 2019, at San Francisco, California.

/s/ Kate Erwin  
Kate Erwin


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# EXHIBIT 1

**EXHIBIT 1**

U.S. Reissue Patent No. RE46,964		
Claim	Limitations	Hover-1 Ultra
1	A two-wheel, self-balancing vehicle device, comprising:	<p>The Hover-1 Ultra is “a two-wheel balancing electric scooter.” RZRDGL0013893. During operation, the vehicle self-balances, for example, by using “digital electronic gyroscopes and acceleration sensors to control balance and motion.” RZRDGL0013876; <i>see also, e.g.</i>, RZRDGL0013883-0013886; RZRDGL0013893.</p> <p>To the extent the preamble is a limitation, it is met both literally and under the doctrine of equivalents.</p>
	a first foot placement section and a second foot placement section that are coupled to one another and are independently rotatable along an axis passing through a first wheel and a second wheel;	<p>The Hover-1 Ultra, as shown in the photo below, has a first foot placement section and a second foot placement section that are coupled to one another. <i>See, e.g.</i>, RZRDGL0013875; RZRDGL0013883-0013885.</p> <div data-bbox="831 560 1631 833" data-label="Image"> <p>A top-down photograph of a black Hover-1 Ultra scooter. Red arrows point to the left foot plate (labeled 'First foot placement'), the central hinge (labeled 'Coupling'), and the right foot plate (labeled 'Second foot placement'). A red dashed line runs horizontally through the center of the scooter, labeled 'Axis' at both ends. The word 'HOVER-1' is visible on the right foot plate.</p> </div> <p>As shown in the photo below, the foot placement sections are independently rotatable along an axis passing through a first wheel and a second wheel.</p> <div data-bbox="1081 886 1407 1369" data-label="Image"> <p>A front-view photograph of the Hover-1 Ultra scooter. A red dashed line runs vertically through the center, labeled 'Axis' at the top. Red curved arrows indicate the independent rotation of the foot plates around this axis.</p> </div> <p>Accordingly, this limitation is met both literally and under the doctrine of equivalents.</p>

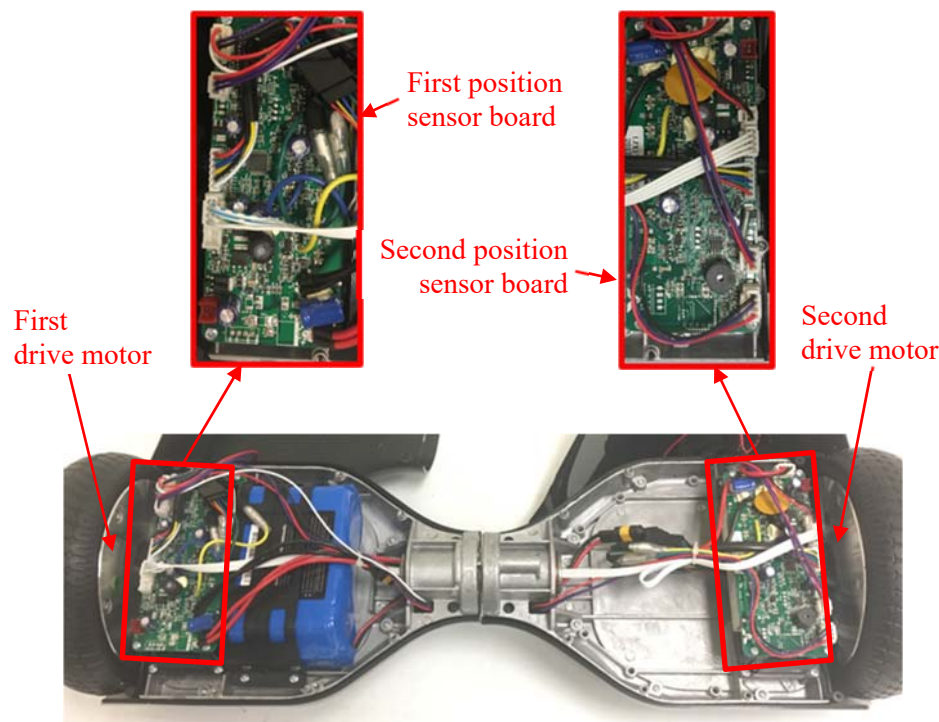
**EXHIBIT 1**

	<p>said first wheel associated with the first foot placement section and said second wheel associated with the second foot placement section, the first and second wheels being spaced apart and substantially parallel to one another;</p>	<p>The Hover-1 Ultra, as shown in the photo below, has a first wheel associated with the first foot placement section and a second wheel associated with the second foot placement section. <i>See, e.g.,</i> RZRDGL0013875. The first and second wheels are spaced apart and substantially parallel to one another.</p> <div data-bbox="798 306 1701 574"></div> <p>Accordingly, this limitation is met both literally and under the doctrine of equivalents.</p>
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**EXHIBIT 1**

a first position sensor and a first drive motor configured to drive the first wheel, a second position sensor and a second drive motor configured to drive the second wheel; and

The Hover-1 Ultra has “[t]wo driver motors [that] are controlled independently.” RZRDGL0013893; *see also, e.g.*, RZRDGL0013876. On information and belief, a drive motor (also referred to as a driver motor) is configured to drive each wheel. As shown in the photos below, each wheel is associated with a position sensor board.





For example, on information and belief, the first and second position sensor boards include a gyroscope and/or an acceleration sensor. *See, e.g.*, RZRDGL0013876. On information and belief, the gyroscope and/or an acceleration sensor send signals through the position sensor boards to a motor control board, which controls the drive motors. *See, e.g., id.* Accordingly, the Hover-1 Ultra has a first position sensor (e.g., gyroscope and/or acceleration sensor) and a first drive motor (e.g., driver motor) configured to drive the first wheel and a second position sensor (e.g., gyroscope and/or acceleration sensor) and a second drive motor (e.g., driver motor) configured to drive the second wheel.

Accordingly, this limitation is met both literally and under the doctrine of equivalents.

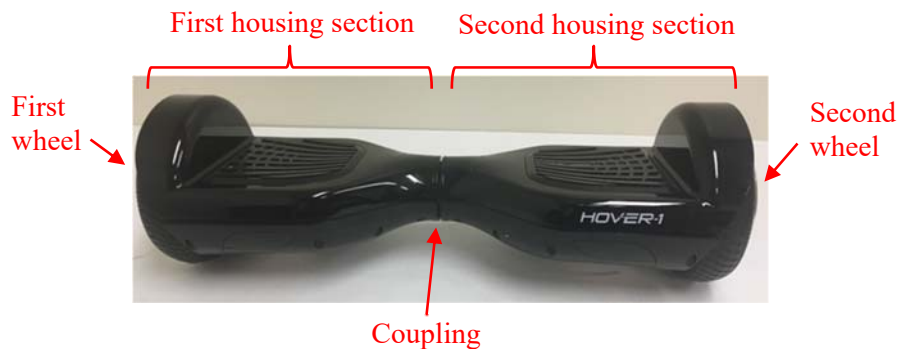
**EXHIBIT 1**

	control logic that drives the first wheel toward self-balancing the first foot placement section in response to position data from the first sensor and that drives the second wheel toward self-balancing the second foot placement section in response to position data from the second foot placement section.	<p>The Hover-1 Ultra “uses digital electronic gyroscopes and acceleration sensors to control balance and motion” and “a control system to drive the motors ... .” RZRDGL0013876; <i>see also, e.g.</i>, RZRDGL0013883-0013886; RZRDGL0013893. On information and belief, the Hover-1 Ultra’s control system contains control logic that uses, for example, motors associated with each wheel to drive each wheel toward self-balancing the associated foot placement section in response to position data received from, for example, the gyroscopes and acceleration sensors. <i>Id.</i> On information and belief, the control logic resides on the position sensor boards identified above.</p> <p>Accordingly, this limitation is met both literally and under the doctrine of equivalents.</p>
3	<p>The device of claim 1,</p> <p>wherein the first foot placement section and the second foot placement section are positioned substantially linearly between the first and second wheel.</p>	<p><i>See</i> claim 1, above.</p> <p>The first foot placement section and the second foot placement section are positioned substantially linearly between the first and second wheel. <i>See, e.g.</i>, RZRDGL0013875.</p> <div data-bbox="814 812 1711 1076" data-label="Image"> </div> <p>Accordingly, this limitation is met both literally and under the doctrine of equivalents.</p>

**EXHIBIT 1**

5	The device of claim 1, further comprising:	<i>See</i> claim 1, above.
	a first housing section on which the first foot placement section is provided, the first housing section housing the first sensor and first drive motor; and	<p>The Hover-1 Ultra has a first housing section on which the first foot placement section is provided. <i>See, e.g.</i>, RZRDGL0013875. The first housing section houses the first sensor. <i>See, e.g.</i>, RZRDGL0013876. On information and belief, the first drive motor is covered by at least a portion of the first housing section.</p> <p style="text-align: center;">First housing section</p>  <p>Accordingly, this limitation is met at least under the doctrine of equivalents.</p>
	a second housing section on which the second foot placement section is provided, the second housing section housing the second sensor and second drive motor.	<p>The Hover-1 Ultra has a second housing section on which the second foot placement section is provided. <i>See, e.g.</i>, RZRDGL0013875. The second housing section houses the second sensor. <i>See, e.g.</i>, RZRDGL0013876. On information and belief, the second drive motor is covered by at least a portion of the second housing section.</p> <p style="text-align: center;">Second housing section</p>  <p>Accordingly, this limitation is met at least under the doctrine of equivalents.</p>

**EXHIBIT 1**

<p>6</p>	<p>The device of claim 5,  wherein the control logic include a first control logic controlling the first drive motor located in the first housing section and a second control logic controlling the second drive motor located in the second housing section.</p>	<p><i>See</i> claim 5, above.</p> <p>The Hover-1 Ultra “uses digital electronic gyroscopes and acceleration sensors to control balance and motion” and “a control system to drive the motors.” RZRDGL0013876. The “[t]wo driver motors are controlled independently.” RZRDGL0013893. On information and belief, the control logic resides on the position sensor boards, identified above in connection with claim 1, which are located within the housing sections. Accordingly, on information and belief, the control logic includes a first control logic controlling the first drive motor, which is covered by at least a portion of the first housing section, and a second control logic controlling the second drive motor, which is covered by a portion of the second housing section.</p> <p>Accordingly, this limitation is met at least under the doctrine of equivalents.</p>
<p>7</p>	<p>The device of claim 5,  wherein the first drive wheel extends from the first housing section on an end substantially opposite where the first housing section is coupled to the second housing section, and the second drive wheel extends from the second housing section on an end substantially opposite where the second housing section is coupled to the first housing section.</p>	<p><i>See</i> claim 5, above.</p> <p>The first drive wheel extends from the first housing section on an end substantially opposite where the first housing section is coupled to the second housing section. The second drive wheel extends from the second housing section on an end substantially opposite where the second housing section is coupled to the first housing section.</p> <div data-bbox="821 855 1713 1201">  </div> <p>Accordingly, this limitation is met both literally and under the doctrine of equivalents.</p>



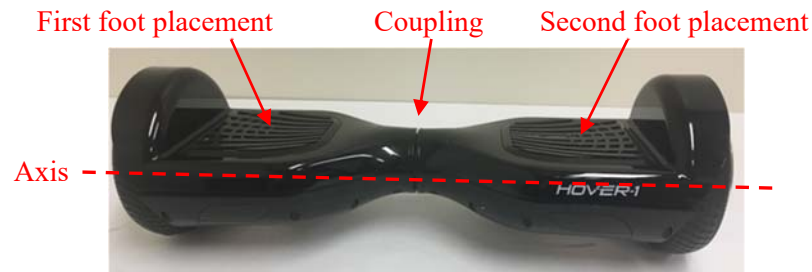
**EXHIBIT 1**

8	The device of claim 1,	<i>See</i> claim 1, above.
	further comprising a platform sensor provided at at least one of the first and second foot placement sections that detects when a user is standing on that foot placement section.	<p>The Hover-1 Ultra has “four sensors under the foot mats on [the] Ultra.” RZRDGL0013877. “When the user steps off the scooter mats, it will automatically initiate self-calibration.” <i>Id.</i> Accordingly, the Hover-1 Ultra has a platform sensor provided at at least one of the first and second foot placement sections that detects when a user is standing on that foot placement section.</p> <p>Accordingly, this limitation is met both literally and under the doctrine of equivalents.</p>
9	The device of claim 1,	<i>See</i> claim 1, above.
	further comprising a bias mechanism for returning the two independently movable first and second foot placement sections toward alignment in the absence of a force by a user displacing the two foot placement sections from alignment.	<p>On information and belief, the Hover-1 Ultra has a bias mechanism for returning the two independently movable first and second foot placement sections toward alignment in the absence of a force by a user displacing the two foot placement sections from alignment. <i>See, e.g.</i>, RZRDGL0013877; RZRDGL0013883-0013885.</p> <p>Accordingly, this limitation is met at least under the doctrine of equivalents.</p>
10	A two-wheel self-balancing vehicle device, comprising:	<p>The Hover-1 Ultra is “a two-wheel balancing electric scooter.” RZRDGL0013893. During operation, the vehicle self-balances, for example, by using “digital electronic gyroscopes and acceleration sensors to control balance and motion.” RZRDGL0013876; <i>see also, e.g.</i>, RZRDGL0013883-0013886; RZRDGL0013893.</p> <p>To the extent the preamble is a limitation, it is met both literally and under the doctrine of equivalents.</p>

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a first foot placement section and a second foot placement section that are coupled to one another and are independently rotatable along an axis passing through a first wheel and a second wheel;

The Hover-1 Ultra, as shown in the photo below, has a first foot placement section and a second foot placement section that are coupled to one another. *See, e.g.*, RZRDGL0013875; RZRDGL0013883-0013885.



As shown in the photo below, the foot placement sections are independently rotatable along an axis passing through a first wheel and a second wheel.



Accordingly, this limitation is met both literally and under the doctrine of equivalents.

**EXHIBIT 1**


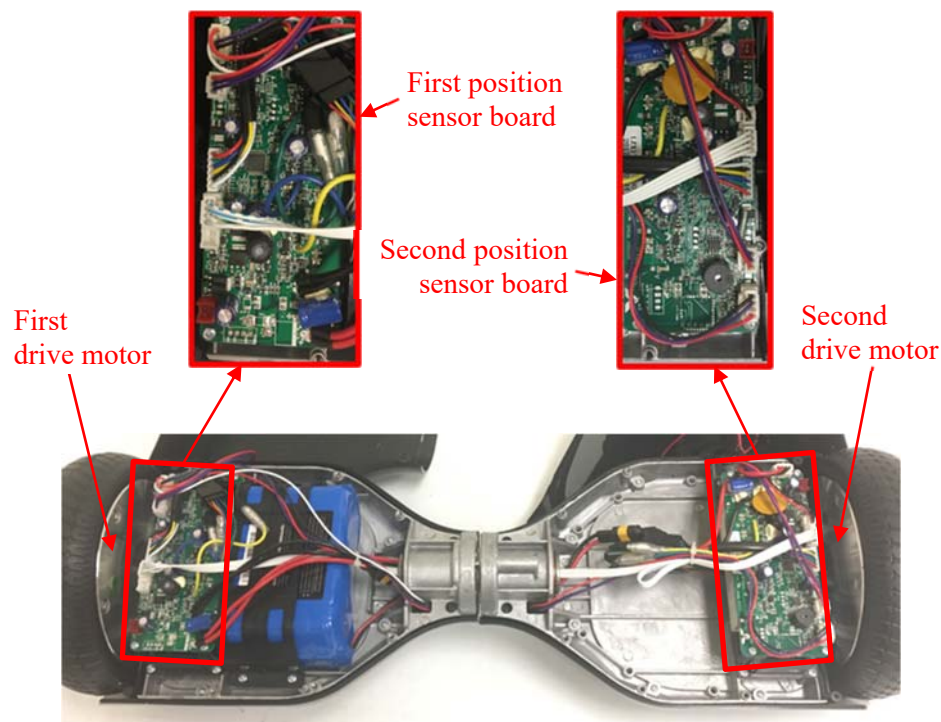
	<p>said first wheel associated with the first foot placement section and said second wheel associated with the second foot placement section, the first and second wheels being spaced apart and substantially parallel to one another;</p>	<p>The Hover-1 Ultra, as shown in the photo below, has a first wheel associated with the first foot placement section and a second wheel associated with the second foot placement section. <i>See, e.g.,</i> RZRDGL0013875. The first and second wheels are spaced apart and substantially parallel to one another.</p> <div data-bbox="816 306 1715 574"><p>The image shows a black Hover-1 Ultra self-balancing scooter. Four red arrows point to specific parts of the scooter: 'First foot placement' points to the left footpad, 'Second foot placement' points to the right footpad, 'First wheel' points to the left wheel, and 'Second wheel' points to the right wheel. The scooter is shown from a top-down perspective, highlighting the parallel arrangement of the footpads and wheels.</p></div> <p>Accordingly, this limitation is met both literally and under the doctrine of equivalents.</p>
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EXHIBIT 1

a first position sensor and a first drive motor configured to drive the first wheel a second position sensor and a second drive motor configured to drive the second wheel; and

The Hover-1 Ultra has “[t]wo driver motors [that] are controlled independently.” RZRDGL0013893; *see also, e.g.*, RZRDGL0013876. On information and belief, a drive motor (also referred to as a driver motor) is configured to drive each wheel. As shown in the photos below, each wheel is associated with a position sensor board.





For example, on information and belief, the first and second position sensor boards include a gyroscope and/or an acceleration sensor. *See, e.g.*, RZRDGL0013876. On information and belief, the gyroscope and/or an acceleration sensor send signals through the position sensor boards to a motor control board, which controls the drive motors located within the wheels. *See, e.g., id.* Accordingly, the Hover-1 Ultra has a first position sensor (e.g., gyroscope and/or acceleration sensor) and a first drive motor (e.g., driver motor) configured to drive the first wheel and a second position sensor (e.g., gyroscope and/or acceleration sensor) and a second drive motor (e.g., driver motor) configured to drive the second wheel.

Accordingly, this limitation is met both literally and under the doctrine of equivalents.

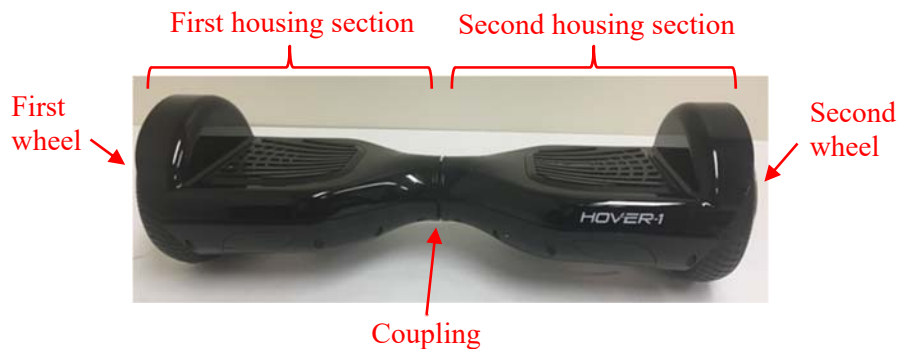
**EXHIBIT 1**

	control logic that drives the first wheel toward self-balancing the first foot placement section in response to position data from the first sensor and that drives the second wheel toward self-balancing the second foot placement section in response to position data from the second sensor.	<p>The Hover-1 Ultra “uses digital electronic gyroscopes and acceleration sensors to control balance and motion” and “a control system to drive the motors.” RZRDGL0013876; <i>see also, e.g.</i>, RZRDGL0013883-0013886; RZRDGL0013893. On information and belief, the Hover-1 Ultra’s control system contains control logic that uses, for example, motors associated with each wheel to drive each wheel toward self-balancing the associated foot placement section in response to position data received from, for example, the gyroscopes and acceleration sensors. <i>Id.</i> On information and belief, the control logic resides on the position sensor boards identified above.</p> <p>Accordingly, this limitation is met both literally and under the doctrine of equivalents.</p>
11	<p>The device of claim 10,</p> <p>wherein the first foot placement section and the second foot placement section are positioned substantially linearly between the first and second wheel.</p>	<p><i>See</i> claim 10, above.</p> <p>The first foot placement section and the second foot placement section are positioned substantially linearly between the first and second wheel. <i>See, e.g.</i>, RZRDGL0013875.</p> <div data-bbox="816 812 1713 1076" data-label="Image"> </div> <p>Accordingly, this limitation is met both literally and under the doctrine of equivalents.</p>

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13	The device of claim 10, further comprising:	<i>See</i> claim 10, above.
	a first housing section on which the first foot placement section is provided, the first housing section housing the first sensor and first drive motor; and	<p>The Hover-1 Ultra has a first housing section on which the first foot placement section is provided. <i>See, e.g.</i>, RZRDGL0013875. The first housing section houses the first sensor. <i>See, e.g.</i>, RZRDGL0013876. On information and belief, the first drive motor is covered by at least a portion of the first housing section.</p> <p style="color: red; text-align: center;">First housing section</p>  <p>Accordingly, this limitation is met at least under the doctrine of equivalents.</p>
	a second housing section on which the second foot placement section is provided, the second housing section housing the second sensor and second drive motor.	<p>The Hover-1 Ultra has a second housing section on which the second foot placement section is provided. <i>See, e.g.</i>, RZRDGL0013875. The second housing section houses the second sensor. <i>See, e.g.</i>, RZRDGL0013876. On information and belief, the second drive motor is covered by at least a portion of the second housing section.</p> <p style="color: red; text-align: center;">Second housing section</p>  <p>Accordingly, this limitation is met at least under the doctrine of equivalents.</p>

**EXHIBIT 1**

14	<p>The device of claim 13,</p> <p>wherein the control logic include a first control logic controlling the first drive motor located in the first housing section and a second control logic controlling the second drive motor located in the second housing section.</p>	<p><i>See</i> claim 13, above.</p> <p>The Hover-1 Ultra “uses digital electronic gyroscopes and acceleration sensors to control balance and motion” and “a control system to drive the motors.” RZRDGL0013876. The “[t]wo driver motors are controlled independently.” RZRDGL0013893. On information and belief, the control logic resides on the position sensor boards, identified above in connection with claim 10, which are located within the housing sections. Accordingly, on information and belief, the control logic includes a first control logic controlling the first drive motor, which is covered by at least a portion of the first housing section, and a second control logic controlling the second drive motor, which is covered by at least a portion of the second housing section.</p> <p>Accordingly, this limitation is met at least under the doctrine of equivalents.</p>
15	<p>The device of claim 13,</p> <p>wherein the first drive wheel extends from the first housing section on an end substantially opposite where the first housing section is coupled to the second housing section, and the second drive wheel extends from the second housing section on an end substantially opposite where the second housing section is coupled to the first housing section.</p>	<p><i>See</i> claim 13, above.</p> <p>The first drive wheel extends from the first housing section on an end substantially opposite where the first housing section is coupled to the second housing section. The second drive wheel extends from the second housing section on an end substantially opposite where the second housing section is coupled to the first housing section.</p> <div data-bbox="821 855 1713 1201">  </div> <p>Accordingly, this limitation is met both literally and under the doctrine of equivalents.</p>

**EXHIBIT 1**

16	The device of claim 10,	<i>See</i> claim 10, above.
	further comprising a platform sensor provided at at least one of the first and second foot placement sections that detects when a user is standing on that foot placement section.	<p>The Hover-1 Ultra has “four sensors under the foot mats on [the] Ultra.” RZRDGL0013877. “When the user steps off the scooter mats, it will automatically initiate self-calibration.” <i>Id.</i> Accordingly, the Hover-1 Ultra has a platform sensor provided at at least one of the first and second foot placement sections that detects when a user is standing on that foot placement section.</p> <p>Accordingly, this limitation is met both literally and under the doctrine of equivalents.</p>
17	The device of claim 10,	<i>See</i> claim 10, above.
	further comprising a bias mechanism for returning the two independently movable first and second foot placement sections toward alignment in the absence of a force by a user displacing the two foot placement sections from alignment.	<p>On information and belief, the Hover-1 Ultra has a bias mechanism for returning the two independently movable first and second foot placement sections toward alignment in the absence of a force by a user displacing the two foot placement sections from alignment. <i>See, e.g.</i>, RZRDGL0013877; RZRDGL0013883-0013885.</p> <p>Accordingly, this limitation is met at least under the doctrine of equivalents.</p>

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